
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	
	:	
ALI ABU, THOMAS ASARE, SEIDU	:	Mag. No. 08-3015 (PS)
GADO, EDMOND MENSAH, and	:	
FRANCIS OKYERE	:	

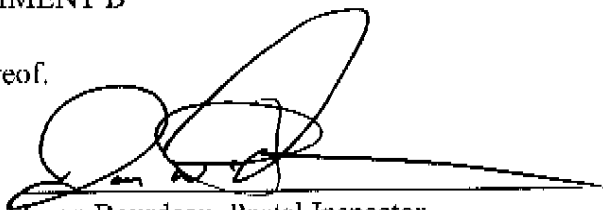
I, Jason Bourdeau, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From at least July 2007 through in or about January 2008, in Essex County, in the District of New Jersey, and elsewhere, defendants ALI ABU, THOMAS ASARE, SEIDU GADO, EDMOND MENSAH, and FRANCIS OKYERE:

SEE ATTACHMENT A

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

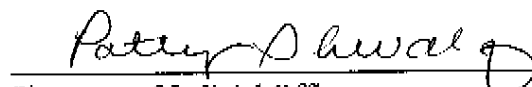
continued on the attached page and made a part hereof.



Jason Bourdeau, Postal Inspector
United States Postal Inspection Service

Sworn to before me and subscribed in my presence,
January 16, 2008 at Newark, New Jersey

HONORABLE PATTY SHWARTZ
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count 1

From in or about July 2007 through in or about January 2008, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

ALI ABU, THOMAS ASARE, SEIDU GADO,
EDMOND MENSAH, and FRANCIS OKYERE

did knowingly and willfully conspire and agree with each other and others yet unknown to produce, use, and traffic in one or more counterfeit access devices affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 1029(b)(2).

Count 2

In or about January 2008, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

SEIDU GADO

did knowingly make, forge, counterfeit, mutilate, and alter a passport and instrument purporting to be a passport, with intent that the same may be used,

In violation of Title 18, United States Code, Section 1543.

ATTACHMENT B

I, Jason Bourdeau, a Postal Inspector with the United States Postal Inspection Service, having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts:

1. On or about July 12, 2007, Edmond Mensah (hereinafter, "defendant MENSAH") received via electronic mail personal identification information, including, but not limited to, Social Security Numbers, dates of birth, and home addresses for several victims of identity theft from an unidentified co-conspirator. Among the victims included in the July 12, 2007 electronic mail were Victim 1, Victim 2, and Victim 3, all of whom are residents of states other than the State of New Jersey. Postal inspectors have interviewed the three victims and confirmed that each is a victim of identity theft.

2. This was not the first time that defendant MENSAH trafficked in personal information. On or about February 21, 2007, an unidentified co-conspirator sent defendant MENSAH an e-mail with an attachment containing a spreadsheet of the names, mailing addresses, telephone numbers, credit card numbers, credit card expiration dates, and credit card three digit security codes for approximately 10,000 individuals with credit card accounts. Postal inspectors spoke with representatives of HSBC Bank and American Express, which issued credit cards to some of those 10,000 individuals. Representatives of HSBC Bank and American Express confirmed that many of the individuals to whom credit cards had been issued by them were the victims of identity theft.

3. On or about July 31, 2007, a Washington Mutual Bank account was opened in the name of Victim 1. The address associated with the account is 492 Orange Street, Apartment 5, Newark, New Jersey 07107. Thomas Asare (hereinafter, "defendant ASARE") resides at that address in Newark.

4. On or about July 31, 2007, a change of address application was submitted via the Internet for an American Express account (hereinafter, "Victim 4"). The address associated with Victim 4's account was changed to 492 Orange Street, Apartment 5, Newark, New Jersey 07107. The telephone number included on the change of address application was a number believed to be subscribed to and used by defendant MENSAH (hereinafter, "Number 1"), and the e-mail address included on the application was an address known to be used by defendant MENSAH. On or about August 22, 2007, postal inspectors interviewed Victim 4, a resident of a state other than the State of New Jersey, and confirmed that he is a victim of identity theft.

5. On or about October 22, 2007, a Washington Mutual Bank account was opened in the name of Victim 2. The telephone number associated with the account is a second number believed to be subscribed to and used by defendant MENSAH (hereinafter, "Number 2"), and the address associated with the account is 480 South 10th Street, Newark, New Jersey 07103. Francis Okyere (hereinafter, "defendant OKYERE") resides at that address in Newark. On or about November 28, 2007, a call was made from Number 2 to Washington Mutual Bank to activate the Personal Identification Number ("PIN") associated with the bank card.

6. On or about October 27, 2007, a fraudulent account was opened with Scottrade, an online brokerage firm, in the name of Victim 3. The telephone numbers associated with the account are Number 1 and Number 2, and the address associated with the account is 60 South Munn Avenue, Apartment 408, East Orange, New Jersey 07018. Seidu Gado (hereinafter, "defendant GADO") resides in Apartment 1002 at that East Orange address. Postal inspectors, however, have surveillance video of defendant GADO retrieving mail from the mailbox associated with Apartment 408. Defendant GADO's association with the mailbox for Apartment 408 was also confirmed by a confidential source.

7. On or about November 26, 2007, a customer of Chase Bank, who is a resident of a state other than the State of New Jersey (hereinafter, "Victim 5"), had the address on two of his accounts changed, without his knowledge or consent, to 60 South Munn Avenue, Apartment 911, East Orange, New Jersey 07018. Ali Abu (hereinafter, "defendant ABU") resides at that East Orange address. The address change was completed over the telephone, and the number from which the change was made was the same number used to change the address on a Wells Fargo account held by another victim of identity theft to 492 Orange Street, Apartment 5, Newark, New Jersey.

8. Video obtained from Chase Bank Corporate Security shows an individual believed to be defendant OKYERE accessing and withdrawing funds from Victim 5's account at a Chase Bank ATM located at 2084 Linden Boulevard, Brooklyn, New York on or about December 29, 2007 and again on or about January 2, 2008. As a result of defendant OKYERE'S and his co-conspirators' actions, Victim 5 suffered a loss in excess of \$14,000.

9. Postal inspectors have conducted surveillance of the two Newark addresses and the East Orange address in September 2007 and January 2008.

(a) On or about September 18, 2007, a piece of first class mail from Capital One with a credit card in the name of a known victim of identity theft was delivered to 492 Orange Street, Apartment 5, Newark, Jersey. The mail carrier was observed delivering the mail and stated, in substance and in part, that no other mail was in the mailbox and that the only piece of mail he delivered that day was the mail from Capital One. Defendant ASARE was observed retrieving the envelope from Capital One, manipulating it, and ultimately placing it in the left, side pocket of his jacket. Later that afternoon, defendant ASARE was observed giving what was believed to be the envelope from Capital One to defendant GADO and an unidentified co-conspirator.

(b) On or about January 10, 2008, agents of the United States Secret Service conducted a surveillance of 480 South 10th Street, Newark, New Jersey. Delivered to the residence that day was both mail addressed to defendant OKYERE and mailed addressed to Victim 2. Defendant OKYERE'S son retrieved both pieces of mail from the mailbox and brought them into the residence.

(c) On or about January 10, 2008, postal inspectors conducted a surveillance of 60 South Munn Avenue, East Orange, New Jersey. In the parking garage adjacent to that address,

defendant GADO was observed exiting his vehicle and placing a package under the tire of a second vehicle that appeared to be inoperable. Postal inspectors retrieved the package and found it to contain, among other things, two fraudulent passports, each with defendant GADO's picture, and a store receipt with a handwritten note bearing the address "492 Orange Street, Apartment 5, Newark, New Jersey 07107."

(d) On or about January 10, 2008, postal inspectors also witnessed defendant ABU retrieve mail from his mailbox addressed to individuals believed to be victims of identity theft and returned with that mail to Apartment 911.